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*Attorneys for Plaintiff Jorge Lopez-Henriquez*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

JORGE LOPEZ-HENRIQUEZ,

Plaintiff,

-v-

DIAMOND FOUNDRY, INC.,

Defendants.

Civil Action No. 2:22-cv-4267

**STIPULATION AND NOTICE OF  
DISMISSAL WITH PREJUDICE  
UNDER FED. R. CIV. P. 41(a)(1)(A)**

WHEREAS, on August 4, 2022, the defendant filed a motion seeking to dismiss the complaint for lack of subject matter jurisdiction (FRCP 12(b)(1), failure to state a claim (FRCP 12(b)(6) and, alternatively, to compel arbitration;

WHEREAS, on November 1, 2022, the Court entered an order dismissing plaintiff's complaint for lack of subject matter jurisdiction but granted plaintiff leave to amend;

WHEREAS, the parties have agreed to arbitrate this dispute before a JAMS arbitrator in Santa Clara, California, under the JAMS Employment Rules and Procedures;

NOW, THEREFORE, the parties stipulate under Fed. R. Civ. P. 41(a)(1)(A) as follows:

1. The parties shall submit the claims asserted in the complaint and all other claims and defenses arising from plaintiff's employment with defendant to arbitration before a JAMS arbitrator in Santa Clara, California, under the JAMS Employment Rules and Procedures; and

2. Plaintiff hereby dismisses his complaint with prejudice for lack of subject matter jurisdiction.

Dated: November 28, 2022

**DHILLON LAW GROUP, INC.**

/s/ Josiah Cantarino

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